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10 **UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

11 EQUAL EMPLOYMENT OPPORTUNITY) Case No.: C-07-00507 RMW
12 COMMISSION,)
13 Plaintiff(s),) **SECOND STIPULATION AND**
14 vs.) **[] ORDER REQUESTING**
15 SLADANA LUCICH, d/b/a WHITE) **EXTENSION OF CASE MANAGEMENT**
16 OAKS AUTO BODY,) **AND TRIAL DATES**
17 Defendant(s).)
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STIPULATION

19 Plaintiff EEOC and Defendant White Oaks Auto Body
20 Inc., through their counsel of record, hereby stipulate as
21 follows:
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23 WHEREAS, the parties agreed to a tentative settlement at a
24 mediation session on July 31, 2007 which was contingent upon
25 Plaintiff EEOC receiving certain financial records from

1 Defendant by August 21, 2007 to confirm Defendant's financial
2 condition and to allow sufficient time for the EEOC's expert at
3 EEOC Headquarters to inspect and analyze said records;

4 WHEREAS, at the July 31st mediation, the parties also
5 agreed to vacate the existing noticed depositions and discovery
6 for purposes of efficiency and economy and in order to attempt
7 good faith settlement negotiations;

8 WHEREAS, since July 31, 2007, the parties have engaged
9 in numerous conference calls to discuss the records requests and
10 to engage in further settlement negotiations and have exchanged
11 numerous documents and correspondence.

12 WHEREAS, the parties have agreed to schedule another
13 conference call to be held before the end of January 2008 to
14 continue the settlement negotiations.

15 WHEREAS, on November 26, 2007, this Court granted the
16 parties' First Stipulation and Proposed Order Requesting
17 Extension of Case Management and Trial Dates;

18 WHEREAS, the parties expect to continue to engage in
19 good faith settlement negotiation during the ensuing months and
20 the parties recognize that more time is needed in order
21 effectively settle this matter;
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1 WHEREAS, the parties would like to avoid the expense
2 and inconvenience of concurrently taking depositions or
3 conducting other discovery or trial at the same time the parties
4 are attempting to settle this case in good faith;

5 WHEREAS, the current Case Management and Trial dates
6 are as follows:

7	Deadline for Joinder of Any Additional Parties/Amendment of Pleadings	January 29, 2008
8		
9	Plaintiff's Designation of Experts Reports	March 21, 2008
10		
11	Defendant's Designation of Rebuttal Experts with Reports	April 11, 2008
12		
13	Fact Discovery Cutoff	April 11, 2008
14		
15	Expert Discovery Cutoff	April 25, 2008
16		
17	Last Day for Dispositive Motion Hearing	May 30, 2008 9:00 a.m.
18		
19	Final Pretrial Conference	June 23, 2008 2:00 p.m.
20		
21	Trial	July 14, 2008 1:30 p.m.
22		

23 THEREFORE, Plaintiff EEOC and Defendant White Oaks
24 Auto Body, Inc, through their counsel of record, hereby
25 respectfully request this Court to extend the Case Management

1 and Trial Dates approximately sixty (60) more days as follows to
2 allow the parties to negotiate a settlement in good faith:

3	Deadline for Joinder of Any Additional	March 25, 2008
4	Parties/Amendment of Pleadings	
5	Plaintiff's Designation of Experts	March 23, 2008
6	Reports	
7	Defendant's Designation of Rebuttal	June 13, 2008
8	Experts with Reports	
9	Fact Discovery Cutoff	June 13, 2008
10	Expert Discovery Cutoff	June 27, 2008
11	Last Day for Dispositive	July 25, 2008
12	Motion Hearing	9:00 a.m.
13	Final Pretrial Conference	August 28, 2008
14		2:00 p.m.
15	Trial	September 15, 2008
16		1:30 p.m.

16 Dated: _____1/8/08____ _s/ Sanya Hill-Maxion_____
17 Attorney for Plaintiff
18 EQUAL EMPLOYMENT OPPORTUNITY
COMMISSION

19 Dated: = _____1/8/08____ _s/ A.J. Adair_____
20 Attorney for Defendant
21 WHITE OAKS AUTO BODY, INC.
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ORDER

Pursuant to the Stipulation above, the Case Management and Trial Dates are to be extended as follows:

Deadline for Joinder of Any Additional Parties/Amendment of Pleadings	March 25, 2008
Plaintiff's Designation of Experts Reports	March 23, 2008
Defendant's Designation of Rebuttal Experts with Reports	June 13, 2008
Fact Discovery Cutoff	June 13, 2008
Expert Discovery Cutoff	June 27, 2008
Last Day for Dispositive Motion Hearing	July 25, 2008 9:00 a.m.
Final Pretrial Conference	August 28, 2008 2:00 p.m.
Trial	September 15, 2008 1:30 p.m.

IT IS SO ORDERED.

Dated: 2/7/08

Ronald M. Whyte

Honorable Ronald M. Whyte
UNITED STATES DISTRICT JUDGE